

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
CIVIL DIVISION**

KAREN CAREY
3002 Wyndurgh Drive
Columbus, OH 43219,

Plaintiff,

vs.

COLUMBUS BOARD OF EDUCATION
270 East State Street
Columbus, OH 43215,

and

COLUMBUS CITY SCHOOLS
c/o Talisa L. Dixon
In Her Official Capacity as Superintendent of
Columbus City Schools
270 East State Street
Columbus, OH 43215,

and

DR. SANDY D. WOMACK, JR.
In His Official Capacity as
Area Superintendent, Region 3
Columbus City Schools
270 East State Street
Columbus, OH 43215,

and

CHRISTY NICKERSON,
In Her Official Capacity as Principal of
South High School
Columbus City Schools
270 East State Street
Columbus, OH 43215,

Defendants.

Case No.: 2:22-cv-03743

JUDGE

MAGISTRATE

**COMPLAINT (WITH JURY TRIAL
DEMAND)**

1 A. Grant a permanent injunction enjoining Defendants and all persons in active
2 concert or participation with them, from engaging in any employment practice which
3 discriminates against Plaintiff on the basis of color or in retaliation;

4
5 B. Order Defendants to make Plaintiff whole by providing punitive damages for its
6 malicious and/or reckless conduct described above, in amounts to be determined at trial;

7 C. Order Defendants to provide training to its administrators and employees
8 regarding harassment in the workplace;

9 D. Grant such further relief as the Court deems necessary and proper in the public
10 interest; and

11
12 E. Award Plaintiff her costs in this action.

13 **JURY TRIAL DEMAND**

14 Plaintiff requests a jury trial on all questions of fact raised by her Complaint.

15 Respectfully submitted,

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18 _____
19 Tonya McCreary Williams (0091533)
20 **McCreary Law, LLC**
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24 Trial Attorney for Plaintiff Karen Carey